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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF THE  
COURT'S ORDER REGARDING  
QUESTIONS FOR HEARING ON  
PLAINTIFF'S MOTION FOR  
PROVISIONAL RELIEF (DKT. 329)**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am a partner at the law firm Quinn Emanuel Urquhart & Sullivan, LLP,  
4 counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth  
5 in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
7 Seal Portions of the Court’s Order Regarding Questions for Hearing on Plaintiff’s Motion for  
8 Provisional Relief (Dkt. 329) (the “Administrative Motion”). The Administrative Motion seeks an  
9 order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Court’s Order (Dkt. 329)	Highlighted Portions	Waymo (green highlighting)

13 3. The Court’s Order contains references to Waymo’s trade secret information, which  
14 Waymo seeks to seal. The references describe Waymo trade secrets with specificity, including their  
15 description, development, and implementation.

16 4. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 24-15)  
17 and are valuable as trade secrets to Waymo’s business (Dkt. 24-3). The public disclosure of this  
18 information would give Waymo’s competitors access to descriptions of the functionality of Waymo’s  
19 autonomous vehicle system. If such information were made public, I understand that Waymo’s  
20 competitive standing would be significantly harmed.

21 5. Waymo’s request to seal is narrowly tailored to those portions of the Court’s Order that  
22 merit sealing.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
24 true and correct, and that this declaration was executed in San Francisco, California, on May 3, 2017.

25 By /s/ Lindsay Cooper  
26 Lindsay Cooper  
27 Attorneys for WAYMO LLC  
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